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9 Attorneys for Plaintiff
United States of America

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 UNITED STATES OF AMERICA,)	NO. CV 12-06611 PA (PJWx)
)	
15 Plaintiff,)	
)	
16 v.)	CONSENT JUDGMENT OF FORFEITURE
)	
17 \$9,500.00 IN U.S. CURRENCY;)	
18 and \$10,000 IN U.S. CURRENCY)	
)	
19 Defendants.)	
)	
20 PAUL MORQUECHO, JR.,)	
)	
21 Claimant.)	
)	

22 Plaintiff United States of America ("the government") and
23 claimant Paul Morquecho, Jr. ("Claimant") (collectively, the
24 "parties") have reached an agreement that disposes of this case
25 in its entirety. The parties have requested that the Court enter
26 this Consent Judgment of Forfeiture.
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1 This action was commenced on July 31, 2012 against the
2 defendant \$9,500.00. On October 18, 2012, the government filed a
3 first amended complaint adding the defendant \$10,000.00.
4 Claimant filed a claim to the \$10,000.00 (only) on November 26,
5 2012, and an answer on December 17, 2012. No other claims or
6 answers were filed, and the time for filing claims and answer has
7 expired. Notice was given and published in accordance with law.
8 Plaintiff and Claimant have reached an agreement that is
9 dispositive of the action, and have requested that the Court
10 enter this Consent Judgment of Forfeiture. The Court, having
11 been duly advised of and having considered the matter, and based
12 upon the mutual consent of the parties hereto,

13 **HEREBY ORDERS, ADJUDGES AND DECREES THAT:**

14 1. This Court has jurisdiction over the parties and the
15 subject matter of this action.

16 2. Notice of this action has been given in accordance with
17 law. All potential claimants to the defendant currency other
18 than Claimant Paul Morquecho, Jr. are deemed to have admitted the
19 allegations of the Complaint. The allegations set out in the
20 Complaint are sufficient to establish a basis for forfeiture.

21 3. The United States of America shall have judgment as to
22 the entirety of the defendant currency and all interest earned
23 thereon, and no other person or entity shall have any right,
24 title or interest therein. The United States Marshals Service is
25 ordered to dispose of said assets in accordance with law.

26 4. The forfeiture of the defendant currency does not
27 constitute and shall not be construed as a payment of any taxes
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1 (including income taxes), fines or other obligations which may be
2 owed by Claimant, and this Consent Judgment of Forfeiture does
3 not in any way affect any existing tax (including income tax),
4 fine, liability or other debt owed by Claimant. Nothing in this
5 consent judgment is intended or should be construed as an
6 admission by Claimant of any wrongdoing or illegal conduct.

7 5. Claimant has released the United States of America, its
8 agencies, agents, and officers, from any and all claims, actions
9 or liabilities arising out of or related to this action or the
10 seizure of the defendant currency, including, without limitation,
11 any claim for attorneys' fees, costs or interest which may be
12 asserted on behalf of Claimant, whether pursuant to 28 U.S.C. §
13 2465 or otherwise.

14 6. The Court finds that there was reasonable cause for the
15 seizure of the defendant currency and institution of these
16 proceedings. This judgment shall be construed as a certificate
17 of reasonable cause pursuant to 28 U.S.C. § 2465.

18 DATED: March 11, 2013



19
20 THE HONORABLE PERCY ANDERSON
21 UNITED STATES DISTRICT JUDGE
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24

25 [Signatures of the parties appear on following page.]
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1 By their signatures hereunder, Claimant and government
2 counsel affirm that this proposed consent is approved as to form
3 and content, and request that it be entered.
4

5 DATED: March 7, 2013

6 ANDRÉ BIROTTE JR.
United States Attorney
7 ROBERT E. DUGDALE
Assistant United States Attorney
8 Chief, Criminal Division

9 /S/
10 STEVEN R. WELK
Assistant United States Attorney
11 Chief, Asset Forfeiture Section

12 Attorneys for Plaintiff
United States of America

13 DATED: March 7, 2013

14 /S/
15 PAUL MORQUECHO, JR.

16 Claimant in pro per
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